

IN THE UNITED STATES BANKRUPTCY COURT
Northern District of Ohio

| | | |
|--------------------------|---|-------------------|
| In the Matter of: | } | |
| | } | Case No. 13-31432 |
| Ashley N. Kightlinger | } | |
| | } | Chapter 7 |
| | } | |
| Debtor(s) | } | |

Motion To Avoid Lien

1. Debtor, Ashley N. Kightlinger, commenced this case on April 9, 2013, by filing a voluntary petition for relief under Chapter 7 of Title 11 of the United States Bankruptcy Code.
2. This court has jurisdiction over this motion filed pursuant to 11 U.S.C. Sec. 522(f) to avoid and cancel an unperfected lien held by Bass & Associates on behalf of Capital One on behalf of Best Buy Co. on property purchased and held by Debtor.
3. All such possessions of debtor have been claimed as fully exempt in his bankruptcy case.
4. The existence of Bass & Associates on behalf of Capital One on behalf of Best Buy Co.'s unperfected lien impairs exemptions to which the debtor(s) would be entitled under 11 U.S.C. Sec. 522(b).

WHEREFORE, debtor pray for an order against Bass & Associates on behalf of Capital One on behalf of Best Buy Co. avoiding and canceling the unperfected lien on any of debtor's property and for such additional or alternative relief as may be just and proper.

/s/ Larry N. Heiser
Larry N. Heiser (#0075212)
Attorney for Debtor
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NOTICE

IF NO RESPONSE OR OBJECTION IS FILED WITHIN FIFTEEN (15) DAYS OF THE DATE ON THE CERTIFICATE OF SERVICE BELOW, THE COURT MAY GRANT THE REQUESTED RELIEF WITHOUT FURTHER NOTICE.

/s/ Larry N. Heiser

Larry N. Heiser (#0075212)

Attorney for Debtor

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has caused a copy of the foregoing Motion to Avoid Lien to be served on the 28th day of May, 2013 by the Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

United States Trustee
(Registered User)@usdoj.gov)

William L. Swope, Bankruptcy Trustee
Trustee7@sbcglobal.net, wswope@ecf.epiqsystems.com

and via regular U.S. mail to the following entity on the above-indicated date:

Bass & Associates
3936 E. Fort Lowell Road, Ste 200
Tucson, AZ 85712-1083

/s/ Larry N. Heiser

Larry N. Heiser (#0075212)

Attorney for Debtor